

E-filed November 10, 2009

Marjorie Guymon (NV Bar #04983)
 Goldsmith & Guymon, P.C.
 2055 Village Center Circle
 Las Vegas, NV 89134
 702-873-9500
mguymon@goldguylaw.com

-and-

James A. Ryan, Esq. (AZ Bar #009253)
 Brian Sirower, Esq. (AZ Bar #012354)
 Catherine M. Guastello (AZ Bar No. #024697)
 QUARLES & BRADY LLP
 2 North Central Avenue
 Phoenix, AZ 85004-2391
 602-229-5200
james.ryan@quarles.com
brian.sirower@quarles.com
catherine.guastello@quarles.com

Proposed Attorneys for Hotels Nevada, LLC and
 Inns Nevada, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE DISTRICT OF NEVADA**

In re:
 HOTELS NEVADA, LLC,
 Debtor.

In Proceedings Under Chapter 11
 Case No. 2:09-bk-31131-bam

In re:
 INNS NEVADA, LLC,
 Debtor.

Case No. 2:09-bk-31132-bam

**MOTION FOR ORDER AUTHORIZING
 AND DIRECTING (1) JOINT
 ADMINISTRATION AND (2) USE OF A
 CONSOLIDATED CAPTION**

HOTELS NEVADA, LLC and INNS NEVADA, LLC (collectively, "Debtors"),
 the debtors and debtors-in-possession in the above-captioned Chapter 11 cases (the "Chapter 11
 Cases"), file this Motion asking that the Court enter an order authorizing and directing: (1) joint
 administration of the above-captioned bankruptcy proceedings and (2) use of a consolidated
 caption. As discussed below, joint administration of the Chapter 11 Cases is appropriate because,

1 among other things, (i) the Debtors are "affiliates" as that term is defined in Bankruptcy Code
2 §101(2); (ii) similar issues exist in the Chapter 11 Cases; (iii) joint-administration of the Chapter
3 11 Cases will save considerable time and expense because it will, among other things, obviate the
4 need for duplicative notices, applications, and orders.

5 This Motion is further supported by the following Memorandum of Points and
6 Authorities, by the "Declaration of Allyn Burroughs" filed concurrently herewith, and by the
7 entire record before the Court in these Chapter 11 Cases.

8 RESPECTFULLY SUBMITTED this 10th day of November, 2009.

9 James A. Ryan
10 Brian Sirower
11 Catherine M. Guastello
12 QUARLES & BRADY LLP
13 Renaissance One
14 Two North Central Avenue
15 Phoenix, AZ 85004-2391

16 -and-

17 GOLDSMITH & GUYMON, P.C.
18 2055 Village Center Circle
19 Las Vegas, NV 89134

20 By /s/ Marjorie Guymon
21 Marjorie Guymon

22 Proposed Attorneys for Hotels Nevada, LLC and
23 Inns Nevada, LLC
24
25
26
27
28

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL AND PROCEDURAL BACKGROUND

1. On November 5, 2009 (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Code (the "Bankruptcy Code") thereby commencing the Chapter 11 Cases.

2. Since the commencement of their Chapter 11 Cases, the Debtors continue to operate their businesses and manage their assets as debtors and debtors-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

3. This Court has jurisdiction over the Bankruptcy Case pursuant to 28 U.S.C. §§157 and 1334. These matters constitute core proceedings under 28 U.S.C. §157(b)(2).

4. Allyn Burroughs is the responsible person and authorized representative for the Debtors in the Chapter 11 Cases.

5. The Debtors request that the above-captioned Chapter 11 Cases be jointly administered for procedural purposes.

II. LEGAL ARGUMENT

6. By this motion, the Debtors seek entry of an order authorizing and directing: (i) joint administration of the Debtors' Chapter 11 proceedings and (ii) use of a consolidated caption.

7. Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure, courts are authorized to jointly administer bankruptcy proceedings if the debtor entities are affiliated or related entities with proceedings pending in the same court.

8. The Debtors in the above-captioned Chapter 11 Cases are affiliates as that term is defined in the Bankruptcy Code. Accordingly, this Court is authorized to grant the relief requested in this motion.

9. The Debtors believe these cases should be jointly administered because, among other things: (i) similar issues will arise in each of the cases; (ii) Allyn Burroughs is the responsible person for each of the Debtors in their respective Chapter 11 Cases; (iii) the Debtors share common representation in these Chapter 11 Cases; (iv) the Debtors are joint plaintiffs

and/or joint defendants in cases pending in the California and Nevada state courts; and (v) the Debtors are affiliates as defined in Bankruptcy Code §101(2). Entry of an order directing joint administration of these cases will obviate the need for duplicative notices, applications and orders, and thereby save considerable time and expense for the Debtors and their estates.

10. The Debtors request that one docket be maintained for both cases, which docket shall be the docket for the lowest numbered case.

11. Finally, except as set forth below, the Debtors request that the following form of consolidated caption be utilized for all pleadings and orders in these cases:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re: HOTELS NEVADA, LLC, <div style="text-align: center;">Debtor. </div>	In Proceedings Under Chapter 11 Case No. 2:09-bk-31131-bam
In re: INNS NEVADA, LLC, <div style="text-align: center;">Debtor. </div>	Case No. 2:09-bk-31132-bam (Jointly Administered Under Case No. 2:09-bk-31131-bam) [TITLE]

12. Joint administration of these bankruptcy cases will not result in any prejudice to the Debtors' creditors or other parties in interest. In fact, joint administration is in the best interest of these bankruptcy estates since issues common to both Debtors will be addressed in a single forum and by a single judge, without the need for unnecessary duplication of effort on the part of the Court, the Debtors, the United States Trustee, creditors or parties in interest. Joint administration will facilitate the administration process, as well as ease the burden and expense of administering these estates.

NOTICE

13. No trustee, examiner, or creditors' committee has been appointed in these Chapter 11 Cases. Notice of this Motion has been given to the Office of the United States Trustee and the twenty (20) largest unsecured creditors of the Debtors. Because of the nature of the relief requested in this Motion, the Debtors submit that no other notice need be given.

III. CONCLUSION

WHEREFORE, the Debtors respectfully request entry of an order granting the relief requested herein and such other relief as is just and proper. A proposed form of order is attached hereto as Exhibit "A".

RESPECTFULLY SUBMITTED this 10th day of November, 2009.

James A. Ryan
Brian Sirower
Catherine M. Guastello
QUARLES & BRADY LLP
Renaissance One
Two North Central Avenue
Phoenix, AZ 85004-2391

-and-

GOLDSMITH & GUYMON, P.C.
2055 Village Center Circle
Las Vegas, NV 89134

By /s/ Marjorie Guymon
Marjorie Guymon

Proposed Attorneys for Hotels Nevada, LLC and
Inns Nevada, LLC